

**THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

FILED

2007 JUL 23 P 3:15

J&J SPORTS PRODUCTION, INC.,

Plaintiff,

vs.

EL GRAN PALENQUE RESTAURANT, INC.,

Et als.

Defendant.

CLERK OF U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

Case No. 1:07cv522 JCC/TRJ

ANSWER

COMES NOW the Defendant, **EL GRAN PALENQUE RESTAURANT, INC.,** a Virginia Corporation, by Counsel, and for the Answer to the Complaint heretofore filed in this cause states and alleges as follows:

1. The Defendant neither admits nor denies each of the allegations contained in Paragraph #1 of the Complaint, states that it is solely a legal conclusion which does not require an answer.

2. The Defendant neither admits nor denies each of the allegations contained in Paragraph #2 of the Complaint, states that it is solely a legal conclusion which does not require an answer.

3. The Defendant neither admits nor denies each of the allegations contained in Paragraph #3 of the Complaint, states that it is solely a legal conclusion which does not require an answer.

4. The Defendant neither admits nor denies each of the allegations contained in Paragraph #4 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

5. The Defendant admits the allegations contained in Paragraph #5 of the Complaint.

6. The Defendant neither admits nor denies each of the allegations contained in Paragraph #6 of the Complaint, because it is without sufficient knowledge to know who Defendant, **JOHN DOE**, is and therefore demands strict proof thereof.

7. The Defendant neither admits nor denies each of the allegations contained in Paragraph #7 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

8. The Defendant neither admits nor denies each of the allegations contained in Paragraph #4 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

9. The Defendant neither admits nor denies each of the allegations contained in Paragraph #9 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

10. The Defendant neither admits nor denies each of the allegations contained in Paragraph #10 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

11. The Defendant neither admits nor denies each of the allegations contained in Paragraph #11 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

12. The Defendant neither admits nor denies each of the allegations contained in Paragraph #12 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

13. The Defendant neither admits nor denies each of the allegations contained in Paragraph #13 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

14. The Defendant denies the allegations contained in Paragraph #14 of the Complaint and demands strict proof thereof

15. The Defendant denies the allegations contained in Paragraph #15 of the Complaint and demands strict proof thereof

16. The Defendant denies the allegations contained in Paragraph #16 of the Complaint and demands strict proof thereof

17. The Defendant denies the allegations contained in Paragraph #17 of the Complaint in so far as it implies that Defendant permitted anything to occur and neither admits nor denies

each of the allegations contained in the balance Paragraph #17 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

18. The Defendant neither admits nor denies each of the allegations contained in Paragraph #18 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

19. The Defendant incorporates each of its responses to previous paragraph in this response.

20. The Defendant neither admits nor denies each of the allegations contained in Paragraph #20 of the Complaint, states that it is solely a legal conclusion which does not require an answer.

21. The Defendant denies the allegations contained in Paragraph #21 of the Complaint and demands strict proof thereof.

22. The Defendant neither admits nor denies each of the allegations contained in Paragraph #22 of the Complaint, states that it is solely a legal conclusion which does not require an answer.

23. The Defendant denies the allegations contained in Paragraph #23 of the Complaint and demands strict proof thereof

24. The Defendant denies the allegations contained in Paragraph #24 of the Complaint and demands strict proof thereof

25. The Defendant denies the allegations contained in Paragraph #25 of the Complaint and demands strict proof thereof

26. The Defendant incorporates each of its responses to previous paragraph in this response.

27. The Defendant neither admits nor denies each of the allegations contained in Paragraph #27 of the Complaint, states that it is solely a legal conclusion which does not require an answer.

28. The Defendant denies the allegations contained in Paragraph #28 of the Complaint and demands strict proof thereof

29. The Defendant neither admits nor denies each of the allegations contained in Paragraph #29 of the Complaint, states that it is solely a legal conclusion which does not require an answer.

30. The Defendant neither admits nor denies each of the allegations contained in Paragraph #30 of the Complaint, states that it is solely a legal conclusion which does not require an answer.

31. The Defendant neither admits nor denies each of the allegations contained in Paragraph #31 of the Complaint, because it is without sufficient knowledge and demands strict proof thereof.

32. The Defendant denies the allegations contained in Paragraph #32 of the Complaint and demands strict proof thereof


33. The Defendant denies the allegations contained in Paragraph #33 of the Complaint and demands strict proof thereof

34. The Defendant denies each and every other allegation expressed or implied in the Complaint and demands strict proof thereof.

35. Defendant reserves the right to such other and further defenses as may hereafter be revealed by investigation and discovery.

WHEREFORE, the premises considered, having fully answered, the Defendant prays that this Honorable Court will dismiss the Complaint and grant unto your Defendant its costs and reasonable attorney's fees incurred herein.

Respectfully submitted,
EL GRAN PALENQUE RESTAURANT, INC.,
By Counsel



WILLIAM E. HASSAN, ESQ.
VSB # 18077
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Pleading was sent ☒ regular mail, postage prepaid, ☐ handcarried, ☐ telefaxed on the 23 day of July, 2007 to:

M. Scott Bucci, Esq.
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The Fairfax Building at Johnston Willis
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Counsel for Plaintiff


William E. Hassan

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